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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION AND AGREEMENT FOR
ORDER CONTINUING HEARING ON
MOTION FOR RELIEF FROM STAY
BETWEEN THE UTILITY AND JH
KELLY, LLC**

[Relates to Dkt. Nos. 5649-5652]

Regarding Motion Set for Hearing
February 26, 2020 at 10:00 a.m. PST

1 This stipulation (the “**Stipulation and Agreement for Order**”) is entered into by and
2 between Pacific Gas and Electric Company (the “**Utility**”), as debtor and debtor in possession in
3 the above-captioned cases (the “**Chapter 11 Cases**”), and JH Kelly, LLC (“**JH Kelly**”). The
4 Utility and JH Kelly are referred to in this Stipulation and Agreement for Order collectively as
5 the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

6 **RECITALS**

7 A. On February 5, 2020, JH Kelly filed the *Motion for Relief from Automatic Stay*
8 [Dkt. 5649] (the “**Motion**”), and the Notice of Hearing on the Motion [Dkt. 5650], which
9 scheduled a hearing on the Motion (the “**Hearing**”) for February 26, 2020 at 10:00 a.m. PST.

10 B. In the Motion, JH Kelly seeks relief from the automatic stay to permit JH Kelly to
11 move to join the Utility as a party to the litigation pending in the Superior Court of the State of
12 California, County of Shasta, *JH Kelly, LLC v. AECOM Technical Services, Inc., et al.*, Case No.
13 192600.

14 C. The Parties are conferring regarding a potential resolution to the Motion, and
15 desire to continue the Hearing while they continue those discussions.

16 **NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND**
17 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**
18 **JOINTLY REQUEST THE COURT TO ORDER, THAT:**

19 1. This Stipulation shall be effective upon entry of an order by this Court
20 approving it.

21 2. The February 26, 2020 Hearing shall be continued to March 25, 2020 at
22 10:00 a.m. PST.

23 3. The time in which the Utility is permitted to respond to the Motion is
24 continued to no later than March 13, 2020.

25 4. JH Kelly shall be permitted to file a reply in further support of the Motion
26 no later than March 20, 2020.

27 5. This Court shall retain jurisdiction to resolve any disputes or controversies
28 arising from this Stipulation and Agreement for Order or the order approving it.

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Dated: February 16, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP

/s/ Peter J. Benvenutti

Peter J. Benvenutti

*Attorneys for Debtors
and Debtors in Possession*

Dated: February 15, 2020

STOEL RIVES LLP

/s/ David B. Levant

David B. Levant

Attorneys for JH Kelly, LLC